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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

In re INTEL CORP. CPU MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION

Case No.: 3:18-md-2828-SI

This Document Relates to All Actions

DECLARATION OF STEVEN T.
LOVETT IN SUPPORT OF DEFENDANT
INTEL CORPORATION'S MOTION TO
DISMISS

I, STEVEN T. LOVETT, hereby state and declare as follows:

1. I am one of the attorneys for Defendant Intel Corporation (“Intel”) in this action.

I make this declaration in support of Intel’s Motion to Dismiss. I have personal knowledge of the matters set forth herein.

2. Attached as Exhibit 1 is a true and correct copy, with portions relied on in Intel’s Motion to Dismiss highlighted, of the Amended Consolidated Class Action Complaint in *Hauck v. Advanced Micro Devices, Inc.*, No. 5:18-cv-00447-LHK (N.D. Cal. filed Dec. 6, 2018), ECF No. 95.

3. Attached as Exhibit 2 is a true and correct copy, with portions relied on in Intel’s Motion to Dismiss highlighted, of a web page titled “CVE - Frequently Asked Questions” (cited at Paragraph 576, footnote 87 of the Amended Complaint), which is available from the MITRE Corporation’s website at <https://cve.mitre.org/about/faqs.html>.

4. Attached as Exhibit 3 is a true and correct copy, with portions relied on in Intel’s Motion to Dismiss highlighted, of a document titled “Fallout: Leaking Data on Meltdown-resistant CPUs” (cited at Paragraph 581 of the Amended Complaint), which was published by Claudia Canella, Daniel Genkin, Lukas Giner, Daniel Gruss, Moriz Lipp, Marina Minkin, Daniel Moghimi, Frank Piessens, Michael Schwartz, Berk Sunar, Jo Van Bulck, and Yuval Yarom in 2019.

5. Attached as Exhibit 4 is a true and correct copy, with portions relied on in Intel’s Motion to Dismiss highlighted, of a web page titled “Decyphering the Noise Around ‘Meltdown’ and ‘Spectre’” (cited at Paragraph 636 of the Amended Complaint), which is available from McAfee’s website at <https://www.mcafee.com/blogs/other-blogs/mcafee-labs/decyphering-the-noise-around-meltdown-and-spectre/>.

6. Attached as Exhibit 5 is a true and correct copy, with portions relied on in Intel's Motion to Dismiss highlighted, of a document titled "ZombieLoad: Cross-Privilege-Boundary Data Sampling" (cited at Paragraph 575 of the Amended Complaint), which was published by Michael Schwarz, Moritz Lipp, Daniel Moghimi, Jo Van Bulck, Julian Stecklina, Thomas Prescher, and Daniel Gruss in 2019.

7. Attached as Exhibit 6 is a true and correct copy, with portions relied on in Intel's Motion to Dismiss highlighted, of a web page titled "Intel vs AMD Processor Security: Who Makes the Safest CPUs?" (cited at Paragraph 641 of the Amended Complaint), which is available from the Tom's Hardware website at <https://www.tomshardware.com/features/intel-amd-most-secure-processors>.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: July 28, 2020

/s/ Steven T. Lovett

STEVEN T. LOVETT, OSB No. 910701